

CAROL A. SOBEL SBN 84483
MONIQUE A. ALARCON SBN 311650
WESTON ROWLAND SBN 327599
LAW OFFICE OF CAROL A. SOBEL
725 Arizona Avenue, Suite 300
Santa Monica, ca 90401
T. 310 393 3055
E. carolsobel@aol.com
E. monique.alarcon8@gmail.com
E. rowland.weston@gmail.com

PAUL COOK SBN 290583
13148 Parkwood Place
Baldwin Park, CA 91706
E. cookp2012@lawnet.ucla.edu

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF
CALIFORNIA- WESTERN DIVISION**

BALDWIN PARK FREE SPEECH
COALITION, et al.,

,

Plaintiffs,

vs.

CITY OF BALDWIN PARK,
Defendant.

Case No.: 2:19-cv-09864- CAS-E

NOTICE OF MOTION AND
MOTION FOR ISSUANCE OF A
PRELIMINARY INJUNCTION

Date: February 3, 2020

Time: 10:00 a.m.

Ctrm: 8D

Action filed: Nov. 18, 2019

1 NOTICE IS HEREBY GIVEN THAT:

2 On February 3, 2010 at 10:00 a.m. , or as soon thereafter as the motion may
3 be heard in Courtroom 8D of the United States District Court First Street
4 Courthouse in Los Angeles, California, the Honorable Christine Snyder, district
5 judge presiding, Plaintiffs will move the Court for an order granting a Preliminary
6 Injunction enjoining enforcement of Defendant City of Baldwin Park's Municipal
7 Code Section 153.170.040 ("TEMPORARY SIGNS").

8 The basis for the motion is that the challenged Municipal Code provisions
9 restrict core expression in violation of Plaintiffs' rights to free speech under the
10 First Amendment to the United States Constitution and Article I, Sec. 2 and 3 of
11 the California Constitution by imposing an impermissible prior restraint in the
12 form of a permit requirement and an unlawful tax on a temporary sign
13 application,

14 The motion is based on the Notice of Motion and Motion, the concurrently
15 filed Memorandum of Points and Authorities, the Declarations of Robert Ehlers,
16 Paul Cook and Carol Sobel, as well as all exhibits attached to the declarations.

17 The motion is also based on any subsequent pleadings, declarations and
18 exhibits submitted in Reply to the Opposition to the motion, if any, and as may be
19 presented at oral argument in this matter.

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21 Dated: December 30, 2019

LAW OFFICE OF CAROL A. SOBEL
PAUL COOK

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24 /s/ Carol A. Sobel
25 By: CAROL A SOBEL
26 Attorneys for Plaintiffs
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